

**No. PD-1248-19**

In the  
Texas Court of Criminal Appeals  
At Austin

FILED  
COURT OF CRIMINAL APPEALS  
6/30/2020  
DEANA WILLIAMSON, CLERK

—◆—  
No. 01-18-00539-CR

In the  
Court of Appeals for the First District of Texas  
At Houston

—◆—

**No. 1591795**  
In the 230<sup>th</sup> District Court  
Of Harris County, Texas

—◆—

**CHRISTOPHER SIMMS**  
*Appellant*  
V.  
**THE STATE OF TEXAS**  
*Appellee*

—◆—

STATE'S MOTION FOR EXTENSION OF TIME  
WITHIN WHICH TO FILE APPELLATE BRIEF

—◆—

TO THE HONORABLE COURT OF APPEALS:

THE STATE OF TEXAS, pursuant to **TEX. R. APP. P.** 10.1, 10.5(b) and 68.2(c), moves for an extension of time within which to file its appellate reply brief on the merits. In support of its motion, the State submits the following:

1. Appellant was convicted for the offense of aggravated assault and sentenced to 45 years in prison.
2. On November 14, 2019, the First Court of Appeals affirmed appellant's conviction.
3. On December 11, 2019, appellant filed a petition for discretionary review
4. This Court granted appellant's petition for discretionary review on April 1, 2020.
5. This Court accepted appellant's brief on discretionary review on May 28, 2020.
6. The State's reply brief is currently due June 29, 2020.
7. The State seeks a 30-day extension until July 29, 2020 to file its reply brief.
8. This is the State's first request for an extension.
9. The following facts are relied upon to show good cause for the requested extension:

My work on the reply brief has been delayed by my completion of other briefs and petitions for discretionary review. I submitted the most recent petition on June 22, 2020. I have begun the reply brief in this case but need additional time to complete it.

WHEREFORE, the State prays that this Court will grant the requested extension.

Respectfully submitted,

/s/ Chris Conrad

**CHRIS CONRAD**  
Assistant District Attorney  
Harris County, Texas  
1201 Franklin, Suite 600  
Houston, Texas 77002-1901  
(713) 274-5826  
TBC No. 24055338  
[conrad\\_chris@dao.hctx.net](mailto:conrad_chris@dao.hctx.net)

**CERTIFICATE OF SERVICE**

This is to certify that I requested that a copy of this document be served on appellant's lawyer via TexFile at the following email address:

Allen Isbell  
[allenisbell@sbcglobal.net](mailto:allenisbell@sbcglobal.net)

/s/ Chris Conrad

**CHRIS CONRAD**  
Assistant District Attorney  
Harris County, Texas  
1201 Franklin, Suite 600  
Houston, Texas 77002-1901  
(713) 274-5826  
TBC No. 24055338

Date: June 29, 2020

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conrad\_chris@dao.hctx.net  
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#### **Case Contacts**

<b>Name</b>	<b>BarNumber</b>	<b>Email</b>	<b>TimestampSubmitted</b>	<b>Status</b>
Stacey Soule	24031632	information@spa.texas.gov	6/29/2020 3:34:06 PM	SENT
Daniel McCrory		MCCRORY_DANIEL@dao.hctx.net	6/29/2020 3:34:06 PM	SENT

Associated Case Party: CHRISTOPHER SIMMS

<b>Name</b>	<b>BarNumber</b>	<b>Email</b>	<b>TimestampSubmitted</b>	<b>Status</b>
Allen Isbell		allenisbell@sbcglobal.net	6/29/2020 3:34:06 PM	SENT